REMARKS

Claims 16, 20, 22, 23, 26, 28, 32, 34 and 38 have been amended and claims 41-53 have been canceled. Therefore, claims 16-53 are pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejection:

The Examiner rejected claims 16-18, 20, 21, 23, 24, 26-30, 32, 33, 35, 36 and 38-40 under 35 U.S.C. § 102(e) as being anticipated by Simser (U.S. Patent 6,314,429). Applicants traverse this rejection for at least the following reasons.

Regarding claim 16, Simser fails to anticipate a second mediation module linked to a native language application; wherein in response to <u>receiving a function call from the native language application</u>, the second mediation module is configured to <u>communicate the function call to the first mediation module</u>; and wherein the first mediation module is configured to pass the function call to the platform independent language application. Instead, Simser describes how a Java application may call functions in legacy applications, such as an application developing in C or C++. Simser uses the Java Native Interface (JNI) between Java and other computer languages. While Simser describes a JAVA application making calls to a native language application, Simser does not teach the legacy application calling functions of the platform independent application. As illustrated by FIG. 1 and column 2, line 58 – column 3, line 16 of Simser, a JAVA application may call functions of a legacy application by utilizing Simser's conversion library. Simser is concerned with converting data structures between Java and C for enabling new JAVA applications to reuse functions from existing C applications. Simser is not concerned with calling Java functions from legacy applications. For instance, Simser states that his conversion library may be provided as a DLL "for allowing JAVA^{tm} data objects to access C functions via a mapping layer" (Simser, column 2, lines 20-23). Simser does not mention allowing legacy applications, such as Simser's C application, to call functions in a platform-independent application, such as Simser's

JAVA application. Furthermore, Simser teaches that the Java Native Interface "is provided in the JAVA^{tm} programming language to call C functions as if they were written in JAVA^{tm}" (Simser, column 1, lines 25-29). Given Simser's reliance upon the JNI, Simser's system teaches away from a native language application calling, via a first and second mediation modules, a function in a platform independent language application. Thus, Simser clearly fails to anticipate a mediation module linked to a native language application, wherein in response to receiving a function call from the native language application, the mediation module is configured to communicate the function call to the first mediation module.

Thus, the rejection of claim 16 is not supported by the prior art and removal thereof is respectfully requested. Similar remark as those above regarding claim 16 also apply to claim 28.

Regarding claim 40, Simser fails to anticipate a platform independent language application running on a computer initiating an instance of a native language application and a mediation module, contrary to the Examiner's assertion. The Examiner refers to Simser's teachings regarding calling an API of a legacy application and cites column 3, lines 1-15 of Simser. However, the cited passage does not mention a platform independent language application initiating an instance of a native language application. Instead, the cited passage merely refers to a Java application calling functions in a legacy application. Nowhere does Simser teach that the Java application initiates an instance of the legacy application. Merely calling a function in a legacy application does not imply initiating an instance of the legacy application by the platform independent language application. Thus, Simser clearly fails to anticipate a platform independent language application running on a computer initiating an instance of a native language application and a mediation module, as recited by claim 40. Thus, for at least the reasons above, the rejection of claim 40 is not supported by the prior art and removal thereof is respectfully requested.

Regarding claim 23, contrary to the Examiner's assertion, Simser fails to anticipate that the first mediation module and the second mediation module are configured to communicate with each other one or more of function calls, function parameters, function results, and _event notifications_. The Examiner cites column 2, lines 40-57 and column 3, lines 23-37 of Simser. However, the cited passages fail to mention anything regarding a first mediation module and a second mediation module configured to communicate event notifications. Instead, the cited passages describe how Simser's conversion library may be used to convert function calls, function parameters and function results to allow a JAVA object to call a C function. Nowhere does Simser mention event notifications. Thus, the rejection of claim 23 is not supported by the prior art and removal thereof is respectfully requested. Similar arguments apply to claim 35 as well.

Regarding claim 24, Simser fails to anticipate that the platform independent language application is configured to _launch_ the native language application. The Examiner refers to Simser's teachings regarding calling an API of a legacy application and cites column 3, lines 1-15 of Simser. However, as noted above regarding independent claim 40, the cited passage does not mention a platform independent language application initiating or launching an instance of a native language application. Instead, the cited passage merely refers to a Java application calling functions in a legacy application. Nowhere does Simser teach that the Java application launches an instance of the legacy application. Merely calling a function in a legacy application does not imply launching an instance of the legacy application by the Java application. Thus, for at least the reasons above, the rejection of claim 24 is not supported by the prior art and removal thereof is respectfully requested. Remarks similar to those above regarding claim 24 also apply to claim 36.

Section 103(a) Rejection:

The Examiner rejected claims 19, 22, 25, 31, 34 and 37 under 35 U.S.C. § 103(a) as being unpatentable over Simser in view of Goldsmith (U.S. Patent 5,491,800).

Applicants traverse this rejection for at least the reasons given above in regard to the independent claims.

In regard to the rejections under both sections 102(e) and 103(a), Applicants also assert that the rejection of numerous ones of the dependent claims is further unsupported by the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-78801/RCK.

Also enclosed herewith are the following items:

☒ Return Receipt Postcard

☐ Petition for Extension of Time

☐ Notice of Change of Address

☐ Other:

Respectfully submitted,

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